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16 **UNITED STATES DISTRICT COURT**

17 **DISTRICT OF NEVADA**
18 **(RENO)**

19 CHRISTINA LOUSIE JOHNSON,)
20 Plaintiff,)
21 v.)
22 MARTIN O'MALLEY,)
23 Commissioner of Social Security,)
24 Defendant.)
25 _____)
26)

27) Case No.: 3:24-cv-00197-CLB
28)
29) **UNOPPOSED MOTION FOR**
30) **EXTENSION OF TIME TO FILE**
31) **CERTIFIED ADMINISTRATIVE**
32) **RECORD**
33) **(FIRST REQUEST)**

34 Defendant, Martin O'Malley, Commissioner of Social Security (the "Commissioner"), by and
35 through her undersigned attorneys, hereby moves for a 32-day extension of time to file the Certified
36 Administrative Record (CAR) to Plaintiff's Complaint. The CAR to Plaintiff's Complaint is due to be
37 filed by July 1, 2024. This is Defendant's first request for an extension of time. Defendant requests
38 this extension because Defendant has been notified that the CAR is not yet available due to system
39 issues.

1 issues in this case and that additional time is needed to prepare it. Defendant therefore cannot respond
2 to Plaintiff's Complaint. Once the CAR arrives, Defendant will need to review it for defects before
3 submitting it.

4 For these reasons, Defendant requests an extension in which to respond to the Complaint until
5 August 2, 2024.

6 On June 25, 2024, the undersigned conferred with Plaintiff's counsel, who has no opposition to
7 the requested extension.

8 It is therefore respectfully requested that Defendant be granted an extension of time to file the
9 CAR to Plaintiff's Complaint, through and including August 2, 2024.

10
11 Dated: June 25, 2024

Respectfully submitted,

13 JASON M. FRIERSON
14 United States Attorney

15 */s/ Franco L. Bacia*
16 FRANCO L. BECIA
17 Special Assistant United States Attorney

18 IT IS SO ORDERED:

19
20 
21 UNITED STATES MAGISTRATE JUDGE

22 DATED: June 25, 2024.